

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	<b>Chapter 11 Case No.</b>
<b>In re</b>	:	
	:	<b>08-13555 (JMP)</b>
<b>LEHMAN BROTHERS HOLDINGS INC., et al.</b>	:	
	:	<b>(Jointly Administered)</b>
<b>Debtors.</b>	:	
	:	
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**FOURTH SUPPLEMENTAL AFFIDAVIT AND DISCLOSURE  
STATEMENT OF KATHERINE A. BURROUGHS, ON BEHALF OF DECHERT LLP**

STATE OF CONNECTICUT                     )  
   ) ss:  
COUNTY OF HARTFORD                     )

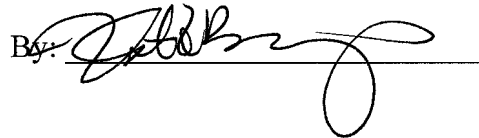
Katherine A. Burroughs, being duly sworn, upon her oath, deposes and says:

1. I am a partner in the law firm of Dechert LLP ("Dechert"), which has offices in several locations, including one located at 1095 Avenue of the Americas, 28<sup>th</sup> Floor, New York, New York 10036.

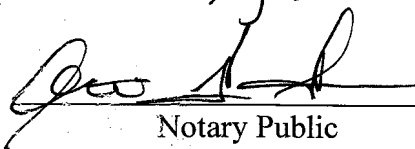
2. I submit this affidavit to supplement the affidavits that I caused to be filed in these cases on January 22, 2009 [Docket No. 2599] (the "Initial Affidavit"), April 14, 2009 [Docket No. 3361], June 24, 2009 [Docket No. 4154] and July 13, 2009 [Docket No. 4358] (the "Disclosure Affidavits").

3. As previously disclosed in the Disclosure Affidavits, Dechert represents the above-captioned debtors (the "Debtors") as ordinary course professionals with respect to certain real estate matters.

4. As set forth in the Initial Affidavit, Dechert represented Korea Development Group prior to the commencement of the Debtors' bankruptcy cases (the "Petition Date") in connection with a potential transaction with Lehman Brothers Holdings Inc. The Initial Affidavit stated that Dechert does not represent Korea Development Bank in matters relating to the Debtors after the Petition Date. However, I recently learned that Dechert has provided postpetition representation and advice to Korea Development Bank in matters relating to the Debtors, including with respect to a subpoena issued by the Court-appointed Examiner. Korea Development Bank has now retained separate counsel and Dechert is no longer representing Korea Development Bank with respect to matters relating to the Debtors' estates, including with respect to a subpoena issued by the Court-appointed Examiner, except as necessary in order to facilitate their transition to new counsel.

By: 

Subscribed and sworn to before me  
this 21<sup>st</sup> day of August, 2009

  
Notary Public

**CATHERINE J. JENSSEN**  
**NOTARY PUBLIC**  
**STATE OF CONNECTICUT**  
**MY COMMISSION EXPIRES: 8/31/09**